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16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 v.  
22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.

Case No. 3:17-cv-00939-WHA

**CORRECTED DECLARATION OF  
ESTHER KIM CHANG IN SUPPORT  
OF DEFENDANTS' OPPOSITION TO  
PLAINTIFF WAYMO LLC'S  
MOTION FOR PRELIMINARY  
INJUNCTION**

Date: May 3, 2017  
Time: 7:30 a.m.  
Ctrm: 8, 19th Floor  
Judge: The Honorable William Alsup

Trial Date: October 2, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendant's Opposition to Plaintiff's Motion  
6 for Preliminary Injunction.

7 2. To comply with this Court's March 16, 2017 Order, we interviewed 86 Uber  
8 employees who had previously worked at Waymo,<sup>1</sup> in order to identify any Waymo documents.

9 3. Attached hereto as Exhibit 1 is a true and correct copy of a Bloomberg Technology  
10 article entitled "Uber Hires Veteran NASA Engineer to Develop Flying Cars," dated  
11 February 6, 2017, from [https://www.bloomberg.com/news/articles/2017-02-06/uber-hires-](https://www.bloomberg.com/news/articles/2017-02-06/uber-hires-veteran-nasa-engineer-to-develop-flying-cars)  
12 [veteran-nasa-engineer-to-develop-flying-cars](https://www.bloomberg.com/news/articles/2017-02-06/uber-hires-veteran-nasa-engineer-to-develop-flying-cars).

13 4. Attached hereto as Exhibit 2 is a true and correct copy of the "Our Story" page  
14 from <https://www.uber.com/our-story>.

15 5. Attached hereto as Exhibit 3 is a true and correct copy of the "Rethinking  
16 transportation" page from <https://newsroom.uber.com/rethinking-transportation>.

17 6. Attached hereto as Exhibit 4 is a true and correct copy of relevant pages from the  
18 deposition of Tim Willis, taken on March 23, 2017.

19 7. Attached hereto as Exhibit 5 is a true and correct copy of relevant pages from the  
20 deposition of Gary Brown, taken on March 24, 2017.

21 8. Attached hereto as Exhibit 6 is a true and correct copy of relevant pages from the  
22 deposition of Michael Janosko, taken on March 23, 2017.

23 9. Attached hereto as Exhibit 7 is a true and correct copy of relevant pages from the  
24 deposition of Pierre-Yves Droz, taken on March 31, 2017.

25 10. Attached hereto as Exhibit 8 is a true and correct copy of a letter to the Nevada  
26 Department of Motor Vehicles, dated March 15, 2017.

27 \_\_\_\_\_  
28 <sup>1</sup> "Waymo" refers to Waymo LLC, Google Inc., and Alphabet Inc.

1 I declare under the penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct. Executed this 11th day of April, 2017, in San Francisco, California.

3  
4 /s/ Esther Kim Chang

ESTHER KIM CHANG

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: April 11, 2017

/s/ Arturo J. González  
Arturo J. González